

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

MARK MCCLESKEY, TRUSTEE AND INDIANA	)	
STATE COUNCIL OF PLASTERERS AND CEMENT	)	
MASONS HEALTH AND WELFARE AND PENSION	)	
FUNDS	)	No. 1:11-cv-795-SEB-MJD
	)	
Plaintiffs,	)	
	)	
	)	
LUCAS STUCCO & EIFS DESIGN, L.L.C.,	)	
a Missouri corporation,	)	
Defendant.	)	

**MOTION FOR CLERK'S ENTRY OF DEFAULT**

To the Clerk of the U.S. District Court for the  
Southern District of Indiana

Plaintiffs, by one of their attorneys, DONALD D. SCHWARTZ and ARNOLD and  
KADJAN, pursuant to F.R.C.P. 55, respectfully request this Honorable Court to enter an Order  
of Default as to liability in favor of Plaintiffs and against Defendant, LUCAS STUCCO & EIFS  
DESIGN, L.L.C. In support thereof, Plaintiffs state:

1. This case was filed on June 20, 2011.
2. Defendant was served with a Summons and Complaint by special process server  
on August 4, 2011 as shown on the return of service previously filed.
3. In excess of 20 days have expired since Service of Process, however, Defendant  
has failed to file an answer or otherwise plead.

WHEREFORE, Plaintiffs move this Court to enter an order of Default against Defendant.

Respectfully submitted,

Arnold & Kadjan

By: s/ Donald D. Schwartz  
Donald D. Schwartz

Donald D. Schwartz  
ARNOLD AND KADJAN  
203 N. LaSalle St., Suite 1650  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 6th day of September 2011, a copy of foregoing Motion for Clerk's Entry of Default was filed electronically. Notice of this filing will be sent to the following parties via U.S. Mail, first class, postage prepaid. Parties may access this filing through the Court's system.

s/ Donald D. Schwartz  
Counsel for Plaintiff

Attorney for Plaintiffs, Mark McCleskey, et. al.

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